



THE CITY OF NEW YORK
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November 18, 2016

VIA ECF

The Honorable John G. Koeltl
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Jane Doe v. City of New York, et. al., 15 Civ. 9137 (JGK)

Your Honor:

I am a Senior Counsel in the office of Zachary W. Carter, Corporation Counsel of the City of New York, representing defendants City of New York, Ismael Figueroa and Gerard Philogene in the above-referenced matter. I write jointly with plaintiff's counsel to respectfully request a thirty day stay of all proceedings in this matter. Plaintiff is presently incarcerated at the Bedford Hills Correctional Facility. Plaintiff was unable to have her deposition taken on November 16, 2016, as contemplated and ordered by this Court, due to a medical condition that may be inappropriate to elaborate on over ECF. It is believed that plaintiff will be unable to participate in discovery, or have her deposition taken, in the next thirty days, hence the parties respectfully request the aforementioned stay. The parties propose to report to Your Honor as to a proposed date to complete discovery following the lifting of the stay, as the present discovery cut-off is December 15, 2016.

Thank you for your consideration herein.

Respectfully submitted,

/s/

Mark D. Zuckerman
Senior Counsel

cc: Robert J. Marinelli, Esq. (via ECF)